

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

July 23, 2024

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

SONIA RODRIGUEZ

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Criminal No. 4:24-cr-382

INFORMATION

THE UNITED STATES CHARGES:

At all times relevant to this INFORMATION, unless otherwise stated:

INTRODUCTION

The Defendant, Related Entities, and Bank Accounts

1. Defendant Sonia Rodriguez (“RODRIGUEZ”) was a resident of Harris County, Texas in the Southern District of Texas.
2. Company 1 was a heating, ventilation, air conditioning, plumbing, and refrigeration company headquartered in Spring, Texas in the Southern District of Texas.
3. RODRIGUEZ was employed at Company 1 as an office manager from October 1995 to June 2022. RODRIGUEZ was the record keeper for Company 1’s accounting system, and RODRIGUEZ’S job duties included managing vendor accounts and fulfilling various payments requests to vendors.
4. RODRIGUEZ owned bank checking account number ending in 3565 located at Wells Fargo Bank, NA and was an authorized signer of this bank account (hereinafter “Account 3565”).

The Scheme

5. RODRIGUEZ, in her capacity as the office manager of Company 1, had full access to Company 1's accounting system. RODRIGUEZ was tasked with paying Company 1's federal payroll taxes to the Electronic Federal Tax Payment System ("EFTPS"). From 2015 to 2020, RODRIGUEZ did not make payments to EFTPS.

6. Company 1 created a vendor number and assigned it to RODRIGUEZ as part of its accounts payable system. Instead of making payments to EFTPS for payroll taxes, RODRIGUEZ would make checks out to herself for values similar to those of the payroll tax payments that were to be paid to EFTPS. RODRIGUEZ deleted the check entries out of the accounting system such that Company 1 could not review these actions under the vendor payment activity. RODRIGUEZ deposited the unauthorized checks into Account 3565 without the knowledge or consent of the owners of Company 1.

7. On or about several different dates from April 1, 2011, continuing through May 12, 2022, RODRIGUEZ deposited checks from Company 1 into Account 3565 in an aggregate amount of \$938,387.26.

COUNT 1

(Wire Fraud – 18 U.S.C. § 1343)

8. Paragraphs 1 through 7 are hereby realleged as if fully set forth herein.

9. On or about the date specified below, in the Southern District of Texas, the defendant,

SONIA RODRIGUEZ,

having knowingly devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communications in interstate

commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice as set forth below:

| Count | Date (on or about) | Description |
|-------|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | May 2, 2022 | <ul style="list-style-type: none"> Check deposit of \$2,746.15 was routed in interstate commerce to RODRIGUEZ's Account ending in 3565. |

All in violation of Title 18, United States Code, Sections 1343 and 2.

NOTICE OF CRIMINAL FORFEITURE

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), the United States gives notice to defendant,

SONIA RODRIGUEZ,

that upon conviction for wire fraud, in violation of Title 18, United States Code, Section 1343, as charged in Count 1, all property, real or personal, which constitutes or is derived from proceeds traceable to such violation shall be forfeited to the United States.

Money Judgment and Substitute Assets

The United States will seek the imposition of a money judgment against the defendant. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution.

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



SHERIN DANIEL
JAMES HU
ASSISTANT UNITED STATES ATTORNEYS